

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff, 12 Civ. 6421 (KMK)

v.

**EDWARD BRONSON, E-LIONHEART
ASSOCIATES, LLC, d/b/a FAIRHILLS CAPITAL**

Defendants

and

FAIRHILLS CAPITAL, INC.

Relief Defendant.

**DECLARATION OF MAUREEN PEYTON KING IN SUPPORT OF
PLAINTIFF'S PROPOSED PAYMENT PLAN**

I, Maureen Peyton King, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a senior trial counsel employed by the Securities and Exchange Commission (the “Commission”) in its New York Regional Office. I am a member of the bar of this Court. I am personally familiar with the facts set forth herein.
2. I make this declaration in support of the Commission’s proposed payment plan.
3. The Amended Judgment, Docket Entry 193, imposed on Bronson and an entity defendant a joint and several obligation to pay disgorgement of \$9,355,271.79 and prejudgment interest of \$2,177,100.59 and on Bronson, an entity defendant and a relief defendant a joint and several obligation to pay disgorgement of \$645,000.00 and prejudgment interest thereon in the amount of \$151,031.37.
4. To date, Bronson has paid only \$25,000 toward the Judgment.

5. Accompanying this declaration is a series of exhibits. The following table lists the exhibits, each of which is a true and correct copy of the document described, with redactions for required and sensitive information.

Exhibit No.	Description
1	An April 29, 2021 letter to P. Rachmuth concerning outstanding documents accompanied by attachments A-F.
2	March 2020 Wells Fargo account statement for Top Knot Inc.
3	A July 28, 2019 letter from Titan Global Holdings Ltd. Attn: Mr. Edward Bronson.
4	The Bronsons' accounting as of February 12, 2021.
5	December 20, 2019 email regarding a Top Knot accounts.
6	May 13, 2019 email concerning Dawn Kellas Bronson's family trust.
7	Subpoena package to Top Knot Inc.
8	Subpoena package to Top Knot Inc. USA.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Wantagh, New York, on May 11, 2021.

s/ Maureen Peyton King
Maureen Peyton King